STATEMENT OF BASIS

CITY OF TACOMA NORTHEND PLANT NO. 3 NPDES PERMIT NO. WA0037214

The purpose of this Statement of Basis is to explain the need to modify the Permit to remove the requirement to submit monthly summary report Form EPA No. 3320-1 to the Department of Ecology (Ecology), to remove the requirement to monitoring effluent temperature, and to correct the influent design loading for total suspended solids.

I. GENERAL INFORMATION

A. <u>Permittee</u>: City of Tacoma

2201 Portland Avenue Tacoma, WA 98421

B. <u>Discharge Locations</u>: Outer Commencement Bay

Latitude: 47° 17' 16" N Longitude: 122° 29' 00" W

II. REQUEST FOR MODIFICATION:

Modifications made to the permit will include removing the requirement to submit a monthly summary report form EPA No. 3320-1 to Ecology found in S3.A of the permit.

During the public comment period it was pointed out to Ecology that an analysis performed by Ecology concluded that a temperature limit and temperature monitoring were not required. Ecology concurred with this finding but did not remove the temperature monitoring requirement from special condition S2. Ecology will remove the temperature monitoring requirement with this modification.

S2.A. Will be modified from:

| Category | Parameter | Units | Sample Point | Minimum Sampling Frequency | Sample Type |
|------------------------|--------------------------|-------------------|----------------|----------------------------------|----------------------|
| Wastewater Effluent | BOD_5 | mg/L, lbs/day | Effluent | 3/week | 24-hr composite |
| Wastewater Effluent | TSS | mg/L, lbs/day | Effluent | 3/week | 24-hr composite |
| Wastewater Effluent | pН | Standard Units | Effluent | Continuous ^a | Recording On-line |
| Wastewater Effluent | Temperature ^b | °C | Effluent | Continuous ^a | Recording On-line |
| Wastewater | Total | mg/L | Final Effluent | Daily | Grab |

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| Category | Parameter | Units | Sample Point | Minimum Sampling Frequency | Sample Type |
|------------------------|----------------------|---------|----------------|----------------------------------|----------------|
| Effluent | Residual Chlorine | | | | |
| Wastewater Effluent | Fecal Coliform | #/100ml | Final Effluent | Daily ^c | Grab |

To:

| Category | Parameter | Units | Sample Point | Minimum Sampling Frequency | Sample Type |
|------------------------|-------------------------------|-------------------|----------------|----------------------------------|-------------------|
| Wastewater Effluent | BOD_5 | mg/L, lbs/day | Effluent | 3/week | 24-hr composite |
| Wastewater Effluent | TSS | mg/L, lbs/day | Effluent | 3/week | 24-hr composite |
| Wastewater Effluent | pН | Standard Units | Effluent | Continuous ^a | Recording On-line |
| Wastewater Effluent | Total Residual Chlorine | mg/L | Final Effluent | Daily | Grab |
| Wastewater Effluent | Fecal Coliform | #/100ml | Final Effluent | Daily ^c | Grab |

During the public comment period, it was pointed out to Ecology that the influent design loading for TSS was incorrect. Ecology concurred with this finding and recalculated the effluent loadings for TSS based on the correct design parameter. The permit and fact sheet were changed based on the correct design loading, however, the influent design loading for TSS listed in Special Condition S4.A was overlooked and will be corrected from 8,882 lbs/day to 11,366 lbs/day with this modification.

S4.A. will be modified from:

Design population

Flows or waste loadings of the following design criteria for the permitted treatment facility shall not be exceeded:

Average flow for the maximum month: 7.2 mgd Maximum daily flow: 15.8 mgd BOD_5 loading for maximum month: 8,882 lbs/day TSS loading for maximum month: 8,882 lbs/day

54,300

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To:

Flows or waste loadings of the following design criteria for the permitted treatment facility shall not be exceeded:

Average flow for the maximum month: 7.2 mgd
Maximum daily flow: 15.8 mgd

BOD₅ loading for maximum month: 8,882 lbs/day
TSS loading for maximum month: 11,366 lbs/day

Design population 54,300

This Statement of Basis will serve as an amendment to the Fact Sheet and Permit.